Dorothy Menasco

From: Keating, Beth [BKeating@gunster.com]
Sent: Tuesday, November 08, 2011 12:25 PM
To: Filings@psc.state.fl.us
Cc: 'Martin Cheryl'
Subject: Docket No. 110001-EI
Attachments: 20111108121106362.pdf; FPUC Post Hearing Statement and Brief (final).DOC

Attached for electronic filing, please find Florida Public Utilities Company's Post Hearing Statement and Brief in the referenced Docket. Please do not hesitate to contact me if you have any questions.

Beth Keating
bkeating@gunster.com
Direct Line: (850) 521-1706

a. Person responsible for this electronic filing:

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 S. Monroe St., Suite 618
Tallahassee, FL 32301
bkeating@gunster.com
Direct Line: (850) 521-1706

b. Docket No. 110001-EI - In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.

c. On behalf of: Florida Public Utilities Company

d. Number of Pages: PDF file: 17 pages (Includes cover page)
Word File: 16 pages

e. Description: FPUC's Post Hearing Statement and Brief

GUNSTER
FLORIDA'S LAW FIRM FOR BUSINESS
Beth Keating | Attorney
Governmental Affairs
215 S. Monroe Street, Suite 601
Tallahassee, FL 32301
P 850-521-1706 C 850-591-9228
gunster.com | View my bio

DOCUMENT NUMBER-DATE
08257 NOV-8 =
FPSC-COMMISSION CLERK

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FLORIDA'S LAW FIRM FOR BUSINESS

Writer's E-Mail Address: bkeating@gunster.com

November 8, 2011

BY ELECTRONIC FILING

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **Docket No. 110001-EI - Fuel and purchased power cost recovery clause with generating performance incentive factor.**

Dear Ms. Cole:

Attached for filing in the referenced Docket, please find Florida Public Utilities Company's Post Hearing Statement and Post Hearing Brief. A copy of the filing in native Word format is also included.

Thank you for your assistance with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,

Beth Keating

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.	DOCKET NO. 110001-EI DATED: November 8, 2011

FLORIDA PUBLIC UTILITIES COMPANY'S POST-HEARING STATEMENT OF ISSUES AND POSITIONS AND POST HEARING BRIEF

Pursuant to Order No. PSC-11-0383-PCO-EI, issued September 12, 2011, and further direction of the Commission at the November 1, 2011 hearing in this proceeding, Florida Public Utilities Company ("FPUC" or "Company") files this Post-Hearing Statement of Issues and Positions and Post-Hearing Brief.

I. FPUC's Position on the Issues – COMPANY SPECIFIC

ISSUE 3A: Is it appropriate for FPUC to include unbilled fuel revenues in its fuel factor calculations for the Northwest and Northeast Divisions?

Type B Stipulation

ISSUE 3B: Is FPUC's proposed method to allocate demand costs to the rate classes appropriate?

FPUC's Position:

Yes. The Company's proposed methodology is appropriate for FPUC because it relies more heavily on company-specific data, which reflects the unique size, locations, and customer demographics of FPUC. In the absence of load data from FPUC's own system, use of this methodology is appropriate and prudent.

II. GENERIC FUEL ADJUSTMENT ISSUES

ISSUE 6: What are the appropriate actual benchmark levels for calendar year 2011 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

Type B Stipulation

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ISSUE 7: What are the appropriate estimated benchmark levels for calendar year 2012 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

Type B Stipulation

ISSUE 8: What are the appropriate fuel adjustment true-up amounts for the period January 2010 through December 2010?

Type B Stipulation

ISSUE 9: What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2011 through December 2011?

Type B Stipulation

ISSUE 10: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2012 to December 2012?

Type B Stipulation

ISSUE 11: What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2012 through December 2012?

Type B Stipulation

III. FUEL FACTOR CALCULATION ISSUES

ISSUE 18: What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2012 through December 2012?

Type B Stipulation

ISSUE 19: What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2012 through December 2012?

Type B Stipulation

ISSUE 20: What are the appropriate levelized fuel cost recovery factors for the period January 2012 through December 2012?

Type B Stipulation

ISSUE 21: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

Type B Stipulation

ISSUE 22: What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

FPUC's Position:

*The appropriate levelized fuel adjustment and purchased power cost recovery factors for the period January 2012 through December 2012 for each Division, adjusted for line loss multipliers and including taxes, is as follows:

Northeast Division

Rate Schedule	*Adjustment*
RS	$0.09267
GS	$0.09217
GSD	$0.09223
GSLD	$0.09231
OL	$0.09286
SL	$0.09245
Step rate for RS	
RS with less than 1,000 kWh/month	$0.08924
RS with more than 1,000 kWh/month	$0.09924

Northwest Division

Rate Schedule	*Adjustment*
RS	$0.10073
GS	$0.10227
GSD	$0.10212
GSLD	$0.10111
OL,Ol1	$0.09981
SL1, SL2, and SL3	$0.09918
Step rate for RS	
RS with less than 1,000 kWh/month	$0.09713
RS with more than 1,000 kWh/month	$0.10713

The appropriate adjusted Time of Use (TOU) and Interruptible rates for the 2012 period for the Northwest Division are:

Time of Use/Interruptible

Rate Schedule	*Adjustment On Peak*	*Adjustment Off Peak*
RS	$0.18113	$0.05813
GS	$0.14227	$0.05227
GSD	$0.14212	$0.06962
GSLD	$0.16111	$0.07111
Interruptible	$0.08611	$0.10111

*

ISSUE 34: What should be the effective date of the fuel adjustment charge and capacity cost recovery charge for billing purposes?

Type B Stipulation

Stipulation: *The new factors should be effective beginning with the first billing cycle for January 2012. The first billing cycle may start before January 1, 2012, and thereafter the fuel adjustment factors and the capacity cost recovery factors should remain in effect until modified by the Commission.*

IV. BRIEF ON DISPUTED ISSUES

In this proceeding, FPUC introduced a new methodology for allocating demand costs across its rate classes. As explained by company witness Cheryl Martin, FPUC has in past Fuel Clause proceedings used the "12 CP (coincident peak) and 1/13th AD (average demand)" methodology, but had incorporated data inputs from a 2007 Florida Power and Light Load Research Study and a 2006 Gulf Power Load Research Study to allocate demand costs for the Northeast and Northwest Divisions, respectively. (TR 359) This year, however, the Company seeks approval to use a new approach that is more dependent on FPUC-specific data, and therefore, more representative of the unique demand activity on FPUC's system. (TR 361)

As Ms. Martin explained in her deposition, since its merger with Chesapeake Utilities Corporation, FPUC has been engaged in an ongoing review of numerous processes and procedures throughout the Company. (Hearing Exhibit 60, BATES 252) Coinciding with that review, FPUC has also been closely scrutinizing its processes and methodologies for its Electric Division in a concerted effort to find ways to mitigate higher prices that have resulted from updated Purchased Power Contracts with FPUC's wholesale providers. (Hearing Exhibit 60; BATES 252-253) Specifically, as Ms. Martin noted, higher fuel rates, along with the down turn in the economy, produced significant usage reductions across the Company's customer base. (TR 361; 366) When the Company reviewed the fuel projections for the coming year, there appeared to be significant changes in the usage characteristics for each rate classification, such that it simply made sense to hire an expert to analyze the situation. (Hearing Exhibit 60, BATES 253) FPUC therefore engaged Christensen and Associates Energy Consulting ("CA") to review the issue and develop a demand allocation methodology tailored for FPUC's system. (Hearing Exhibit 60, BATES 253; TR 362)

CA, specifically Robert Camfield and David Glyer, performed the requested analysis using available Company-specific data. From that, they developed a report for FPUC ("CA Report"). (TR 362; Hearing Exhibit 88). Therein, CA analyzed FPUC's historical customer consumption patterns, and how those patterns had changed as a result of slowing economic activity in the two divisions, as well as significantly higher prices under the referenced Purchased Power Contracts. CA trended customer consumption patterns over a ten year period, 2000 – 2010, and noted a couple of key trends. First, in the Northwest Division, both residential and business/commercial consumption had declined, but residential consumption had declined much faster. By comparison, usage for business and commercial classes had declined most significantly for the Northeast Division. (Hearing Exhibit 88, BATES 003) CA also studied price elasticities for each division and developed models for gauging energy consumption with respect to changes in several variables, including price, weather, and income. (Hearing Exhibit 88, BATES 007, 008) A key factor in CA's analysis is that, under the Purchased Power Agreements for both of FPUC's electric divisions, FPUC is assessed a demand charge by its wholesale providers, which is calculated based upon a determination of the coincident peak that is unique to each contract. (TR 362, 366) The report ultimately concludes that a good indicator of each rate classes' actual contribution to the coincident peak is the KWH usage of each rate class calculated as a percentage of the total KWH usage for the measurement period under each

Purchased Power Agreement. Thus, the Report concludes that KWH usage provides a reasonable basis upon which to allocate the demand costs. (TR 362, 367; Hearing Exhibit 88, BATES 007) Consistent with this conclusion, and as noted by Ms. Martin, even the historical "12 CP and 1/13th AD" methodology includes KWH usage as a significant component of the calculation to allocate demand. (Hearing Exhibit 60, BATES 250)

While FPUC believes that its proposed methodology is appropriate for use by FPUC, FPUC also recognizes that having its own load data would be the optimal means of allocating demand on its system. However, that data is not available, because FPUC does not have the necessary (and costly) monitoring equipment installed on its system that would enable it gather the necessary data. (TR 373; Hearing Exhibit 60, BATES 239)[1] Therefore, as more specifically explained in FPUC's responses to Staff's First Set of Interrogatories, substituting monthly and annual energy usage, as a proxy for demand, just makes sense for FPUC given its unique posture. In the absence of load data, including estimates of class peak demands, energy usage (i.e. KWH) is the only observable means by which one can approximate coincident demand shares for FPUC's rate classes. Moreover, estimated load shapes for classes of customers served by other utilities or areas/regions may not readily fit the Company's electric customer classes because of: a) differences in gas saturation which drives heating loads, b) differences in temperature patterns which tend to be fairly specific to locales on a daily basis, c) differences in class definitions within business classes (C&I), d) differences in the economic sector composition of C&I customers served, e) differences in rate levels and rate design, and f) differences in income and employment levels of the underlying counties served. (Hearing Exhibit 59, BATES 224) To the point, the record reflects that Gulf Power's percentage of sales

[1] Likewise, FPUC has less than 50,000 retail customers, and is therefore not required by Rule 25-6.0437, Florida Administrative Code, to file load research studies. (TR 362; Hearing Exhibit 59, BATES 238, 239, 249, 250, 252)

at the generator for its non-residential classes is significantly different than FPUC's Northwest Division, as reflected below:

Percentage of Sales at Generator	Gulf Power	FPUC Northwest
Residential	47.920%	42.840%
Non-Residential	**41.433%**	**55.670%**

(Hearing Exhibits 30 and 37)

At the hearing, Ms. Martin highlighted one particularly good example of why using another utilities' data is not without its shortcomings. Notably, there is no evidence in the record of this proceeding that indicates why FPL and Gulf Power were chosen as load proxies for each of FPUC's electric division, nor is FPUC aware of any prior proceeding in which the Commission specifically analyzed and determined the propriety of using FPL and Gulf Power as the appropriate proxies. (TR 378) Nonetheless, these are the proxies that have been used historically. Ms. Martin pointed out, however, that if one were to switch these proxies, in other words, use FPL as the proxy for the Northwest Division and Gulf Power as the proxy for the Northeast Division, the demand allocations would be substantially different. (TR 377) As Ms. Martin noted, this certainly calls into question why the use of another utility's load data is an appropriate proxy for use by any other utility, and highlights the fact that demand varies from system to system depending upon a variety of factors. (TR 377) The record further supports Ms. Martin's assessment that load data from utility to utility differs, as reflected in the chart below, which is compiled from data in the exhibits from this proceeding:

Average 12 CP Load Factor At Meter	Florida Power & Light[2]	Gulf Power[3]	TECO[4]	Progress Energy[5]	FPUC Northwest	FPUC Northeast
Residential	57.599%	57.313%	53.820%	49.400%		
General Service	75.719%	63.216%	59.280%	69.500%	N/A	N/A
General Service Demand	78.538%	73.904%	76.200%	78.500%		
General Service Large Demand	77.959%	84.021%				
Interruptible			102.460%	98.300%		

(Hearing Exhibits 9, 10, 27, 27A, 37, and 43) As reflected above, each utility that collects load data reflects a different load profile, consistent with FPUC's contention that it is inappropriate to use another utility's load data to calculate demand allocations for FPUC's system.

Undoubtedly, as the record reflects, FPUC's system is dramatically different from either FPL's system or Gulf Power's system. FPL and Gulf each have a much larger customer base than does FPUC. (TR 377; Hearing Exhibit 60, BATES 239) FPL and Gulf also both cover larger geographic areas, as well as larger cities. (TR 377- 378) FPUC is much more rural and encompasses smaller cities, such as Marianna, Bristol, and Fernandina Beach. (TR 378, 383) Although it was noted that Gulf Power's territory does also include some rural areas, the fact that Gulf is nonetheless significantly larger than FPUC, and encompasses more urban areas, such as Destin, Panama City, and Pensacola, indicates that it has a very different mix of customers. (TR 377) Likewise, FPL has a significant portion of its territory located in South Florida, which

[2] Hearing Exhibits 9 and 10
[3] Hearing Exhibit 37
[4] Hearing Exhibit 43
[5] Hearing Exhibit 27 and 27A

experiences different weather patterns than FPUC's Northeast Division. This difference also indicates that FPL and FPUC's Northeast Division very likely experience different demand patterns. (Hearing Exhibit 60, BATES 242-243)

Staff has questioned, both in Ms. Martin's deposition and at hearing, whether FPUC has analyzed or compared load data from FPL and Gulf Power to determine more specifically whether there are differences in customer load between FPUC and these other two utilities. (TR 376; Hearing Exhibit 60, BATES 241 and 242) As noted previously, FPUC has not. (Id.) The reason FPUC has not done so is two-fold – but quite simple. First, as the record reflects, FPUC does not have its own load data, nor does it have the equipment necessary to collect that data. (Tr 373; Hearing Exhibit 60, BATES 239) Logically, it would be impossible for FPUC to compare the load data from FPL and Gulf Power with non-existent load data from FPUC. Second, as Ms. Martin testified, FPUC believes, based upon reasonable, observable differences, that it is not similarly-situated to Gulf Power and FPL. (TR 373, 375, 376, 377-378, 379, 383; Hearing Exhibit 60, BATES 243- 245) As such, FPUC procured the services of an expert, CA, to develop a methodology relying upon FPUC-specific data, which is the methodology for which FPUC seeks Commission approval. (TR 366, 374)

Staff has also inquired as to whether FPUC's new allocation methodology inappropriately shifts costs away from the residential class. (TR 380; Hearing Exhibit 60, BATES 247-248) As Ms. Martin explained, and as further highlighted in the Company's responses to Staff's Interrogatories, the information available to the Company indicates that this is an appropriate allocation methodology, and thus, costs are being properly assigned to the cost causers. (TR 380, 383, 384; Hearing Exhibit 59; BATES 226) Certainly, an added benefit, from the Company's perspective, is that the residential rate classes in both Divisions will see a reduction in the fuel rate. (TR 380; Hearing Exhibit 60, BATES 269) However, this only makes sense in view of the fact that these classes have demonstrated the most significant trends in declining consumption, particularly in the Northwest Division. (Hearing Exhibit 88; BATES 002) This is also consistent with FPUC's response to Staff Interrogatory No. 1(d), wherein the Company noted that the change in allocation percentages is consistent with its belief regarding ". . .actual demand patterns and the customer class most sensitive to dramatic price increases." (Hearing Exhibit 59, BATES 230) All in all, the evidence supports that the allocation methodology FPUC has proposed is appropriate. There is no evidence in the record to indicate that the methodology inappropriately shifts costs.

Finally, FPUC is not aware of the specifics of Staff's concern with FPUC's proposed methodology. Staff's stated position on Issue 3B suggests only that FPUC should continue to use the prior methodology, because ". . .FPUC has not demonstrated that its proposed method is more accurate or that the FPL and Gulf data are not appropriate for FPUC." (PSC Staff Position Statement, issued October 28, 2011). Staff's position, however, seems to suggest that FPUC should be required to prove a negative, which exceeds FPUC's burden of proof on this issue.[6] Specifically, Issue 3B asks the following:

> **ISSUE 3B:** Is FPUC's proposed method to allocate demand costs to the rate classes appropriate?

Issue 3B requires that FPUC demonstrate that its proposed methodology is reasonable, prudent, and thus, appropriate, for FPUC. Issue 3B does not, however, ask that FPUC prove that the "12

[6] *See* ORDER NO. PSC-93-1374-FOF-TI, issued 09/20/93, page 21, in Docket DOCKET NO. 921250-TI (Initiation of show cause proceedings against CHERRY PAYMENT SYSTEMS, INC. d/b/a CHERRY COMMUNICATIONS for violation of Rule 25-4.118, F.A.C., Interexchange Carrier Selection)(in addressing a finding of fact that staff did not present evidence in the case, the Commission accepted the finding and acknowledged specifically that it is difficult to prove a negative.)

CP and 1/13[th] AD" methodology is inappropriate or unworkable. As explained herein, without FPUC's own load data, it is impossible to conduct any reasonable analysis as to whether Gulf Power and FPL load data is a good match for FPUC's. There is, however, reliable evidence in this record that certainly indicates that it is not.

Moreover, there is no evidence in the record that supports a conclusion that the prior methodology is more appropriate than the methodology proposed by FPUC. FPUC is likewise unaware of any prior Commission decision in which the Commission reached the conclusion that the "12 CP and 1/13[th] AD" methodology, using FPL and Gulf Power data, is the optimal fit for FPUC.[7] In fact, to the contrary, albeit in the context of reviewing cost recovery and allocations for conservation programs, the Commission has previously concluded that:

> We concur that per kilowatt hour conservation cost allocation is the most appropriate methodology for FPUC at this time. The utility has no dispatchable DSM programs for which allocation on the 12 CP and 1/13th AD basis would be more appropriate. . . . **While not perfect, recovery on an energy basis represents a just, fair and reasonable way to recover these costs. [Emphasis added]**

Order No. PSC-93-1845-FOF-EG, issued December 29, 1993, in Docket No. 930759-EG, at pages 12-13. There is significant evidence in the record demonstrating that FPUC's proposed methodology is appropriate for the Company. FPUC recognizes that it carries the burden of proof on this issue, but firmly believes that it has met its burden by demonstrating that the methodology is appropriate for the Company.[8]

[7] Notably, not all of the other IOUs use the "12 CP and 1/13[th] AD" methodology for allocation of demand. Instead, TECO determines the Demand Allocation Percentage using 25% of Percentage of Sales at Generation plus 75% of Percentage of Demand at Generation. (Hearing Exhibit 43, CA-3, p. 1of 4, BATES 15)
[8] *See* Florida Power Corp. v Cresse, 413 So. 2d 1187, 1192 (Fla. 1982).

Conclusion

In sum, as the record demonstrates, FPUC has properly projected its costs. (Hearing Exhibits 28, 29, and 30) Likewise, the Company has calculated its true-up amounts and purchased power cost recovery factors appropriately. (Id.) In addition to these calculations, FPUC has also proposed a new methodology for allocating fuel related demand costs across FPUC's various rate classes. To be clear, this new methodology does not result in an increase in overall fuel costs for FPUC, nor does it create any additional revenues for the Company. Instead, the new methodology simply allocates FPUC's fuel related demand costs based upon FPUC-specific data, as opposed to data obtained from other IOUs – utilities which are not similarly situated to FPUC. In addition, residential customers will, appropriately, see lower bills under the new proposed methodology. While the new methodology represents a departure from the method historically used, it is not a complete deviation. As noted by Ms. Martin, both FPUC's proposed methodology and the historical methodology include KWH usage as an integral component of the allocation calculation. More importantly, the new methodology proposed by FPUC is based upon information taken directly from FPUC's own unique system. Only load data taken directly from FPUC's own system would be more appropriate, and as noted by both Ms. Martin and Commission staff, that data is not available, nor required, from FPUC. FPUC's methodology is appropriate, and the record fully supports this conclusion. Moreover, there is no record evidence to support a conclusion that the proposed methodology is not appropriate, nor is there any evidence in the record that would suggest that the prior methodology is more appropriate – <u>for FPUC</u>.

FPUC is not suggesting that the "12 CP and 1/13th AD" is severely flawed or unusable in every instance. Instead, FPUC's position is that its proposed methodology is more appropriate for FPUC given its unique size, locations, and customer demographics, as well as the fact that FPUC does not have its own load research data available. In the absence of the best data for allocating demand on FPUC's system, that being actual load data from FPUC's own system, FPUC's methodology uses the next best thing, KWH usage data from FPUC's own system. As such, the Commission should approve FPUC's use of its proposed methodology as an appropriate means to allocate demand for FPUC's unique system. Likewise, FPUC asks that the resulting purchased power cost recovery factors for FPUC for 2012 be approved by the Commission.

RESPECTFULLY SUBMITTED this 8th day of November, 2011.

BY: Beth Keating

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

Attorneys for Florida Public Utilities Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 8th day of November, 2011:

Florida Public Utilities Company
Cheryl Martin
P.O. Box 3395
West Palm Beach, FL 33402-3395

Lisa Bennett
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

James D. Beasley
J. Jeffry Wahlen
Ausley Law Firm
Post Office Box 391
Tallahassee, FL 32302

Jeffrey A. Stone
Russell A. Badders
Steven R. Griffin
P.O. Box 12950
Pensacola, FL 32591-2950

James W. Brew
F. Alvin Taylor
Brickfield Law Firm
Eighth Floor, West Tower
1025 Thomas Jefferson St., NW
Washington, DC 20007

Karen S. White
Federal Executive Agencies
c/o AFLSA/JACL-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403-5319

Wade Litchfield
John T. Butler
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420

Paul Lewis
Progress Energy Florida, Inc.
106 East College Avenue, Suite 800
Tallahassee, FL 32301-7740

Kenneth Hoffman
Florida Power & Light Company
215 S. Monroe St., Suite 810
Tallahassee, FL 32301-1859

John T. Burnett
Dianne Triplett
Progress Energy Service Company, LLC
P.O. Box 14042
St. Petersburg, FL 33733-4042

Curtis Young
Florida Public Utilities Company
P.O. Box 3395
West Palm Beach, FL 33402-3395

Robert Scheffel Wright
John T. LaVia
Gardner, Bist, Weiner Law Firm
1300 Thomaswood Dr.
Tallahassee, FL 32308

Susan D. Ritenour
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0780

Vicki Gordon Kaufman
Jon C. Moyle, Jr.
Keefe Law Firm
118 North Gadsden Street
Tallahassee, FL 32301

Paula K. Brown
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-4111

Patrick K. Wiggins
Grossman Law Firm
2022-2 Raymond Diehl Road
Tallahassee, FL 32308

Dan Moore
316 Maxwell Road, Suite 400
Alpharetta, Georgia 30009

Frank E. Bondurant, City Attorney
Bondurant and Fuqua, P.A.
P.O. Box 1508
Marianna, FL 32447

Randy B. Miller
White Springs Agricultural Chemicals, Inc.
Post Office Box 300
White Springs, FL 32096

Cecilia Bradley
Office of the Attorney General
The Capitol – PL01
Tallahassee, FL 32399-0-1050

Charles Rehwinkel/Patricia Christensen
Office of the Public Counsel
4450 Lafayette St. c/o The Florida Legislature
111 West Madison St., Rm. 812
Tallahassee, FL 32399-1400

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706